

Certificate of Notice Page 1 of 5
United States Bankruptcy Court
Eastern District of Pennsylvania

In re:
Alexis S. Lokey
Debtor

Case No. 15-15581-jkf
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-2

User: YvetteWD
Form ID: pdf900

Page 1 of 1
Total Noticed: 1

Date Rcvd: Nov 15, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 17, 2017.

db +Alexis S. Lokey, 8523 Temple Road, Philadelphia, PA 19150-1908

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 17, 2017

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 15, 2017 at the address(es) listed below:

FREDERICK L. REIGLE ecfmail@fredreiglechl3.com, ecf_frpa@trusteel3.com
JOSHUA ISAAC GOLDMAN on behalf of Creditor U.S. BANK NATIONAL ASSOCIATION, Et Al...
bkgroup@kmlawgroup.com, bkgroup@kmlawgroup.com
LEON P. HALLER on behalf of Creditor Pennsylvania Housing Finance Agency lhaller@pkh.com,
dmaurer@pkh.com;mgutshall@pkh.com
MICHAEL D. SAYLES on behalf of Debtor Alexis S. Lokey midusal@comcast.net,
michaeldsaylesesq@comcast.net;r43253@notify.bestcase.com
POLLY A. LANGDON on behalf of Trustee FREDERICK L. REIGLE ecfmail@fredreiglechl3.com,
ecf_frpa@trusteel3.com
THOMAS I. PULEO on behalf of Creditor U.S. BANK NATIONAL ASSOCIATION, Et Al...
tpuleo@kmlawgroup.com, bkgroup@kmlawgroup.com
United States Trustee USTPRegion03.PH.ECF@usdoj.gov
WILLIAM EDWARD CRAIG on behalf of Creditor AmeriCredit Financial Services, Inc. dba GM
Financial ecfmail@mortoncraig.com, mhazlett@mortoncraig.com;mortoncraigecf@gmail.com
TOTAL: 8

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

In re:)	
ALEXIS S. LOKEY)	
<u>Debtor(s)</u>)	CHAPTER 13
)	
AMERICREDIT FINANCIAL SERVICES,)	Case No.: 15-15581 (JKF)
INC. dba GM FINANCIAL)	
<u>Moving Party</u>)	
)	11 U.S.C. 362
v.)	
)	
ALEXIS S. LOKEY)	
<u>Respondent(s)</u>)	
)	
FREDERICK L. REIGLE)	
<u>Trustee</u>)	
)	
)	

**CERTIFICATION OF DEFAULT BY DEBTOR IN VIOLATION OF STIPULATION
APPROVED ON MARCH 24, 2016 AND REQUEST FOR EX PARTE RELIEF FROM
THE AUTOMATIC STAY**

Comes AmeriCredit Financial Services, Inc. dba GM Financial (“GM Financial”) filing this Certification of Default and ex parte request for relief from the automatic stay and hereby certifies;

1. That on March 24, 2016, the Court entered an Order approving a Stipulation providing for an arrearage cure, monthly payments to GM Financial, and for relief from the automatic stay under certain circumstances.
2. Paragraph three (3) of the Stipulation provides that the Debtor is to cure arrears by making her regular monthly payment of \$384.25 plus an additional \$438.58 (total payment of \$822.83) per month for the months of March 2016 through August 2016 (6 month cure) directly to GM Financial.
3. Paragraph four (4) of the Stipulation provides that commencing March 2016, if the Debtor fails to make any payment to GM Financial within thirty (30) days after it falls due, GM Financial may send, via facsimile and regular mail, the Debtor and counsel a written notice of default of the Stipulation. If the default is not cured within ten (10) days of the date of the notice, counsel may file a Certification of Default with the Court and serve it on all interested parties, and the Court shall enter an Order granting relief from the automatic stay.

4. In violation of the Stipulation, the Debtor's account with GM Financial has post-petition arrears through September 2017 in the amount of **\$1,598.80** (in addition, the payment of \$384.25 for October 2017 fell due on the 15th and remains unpaid).
5. On October 23, 2017, GM Financial served a 10 day default letter on the Debtor and her attorney in accordance with the terms of the Stipulation. To date, the default(s) have not been cured.
6. As a result of the defaults stated in paragraph four (4) of this Certification, GM Financial is entitled to stay relief a in regards to personal property described as a 2010 Chevrolet Malibu bearing vehicle identification number 1G1ZB5EB9AF204599.

Respectfully submitted:

/s/ William E. Craig
William E. Craig
Morton & Craig LLC
110 Marter Avenue, Suite 301
Moorestown, NJ 08057
Phone 856/866-0100, Fax: 856/722-1554
Bar ID 92329
Local Counsel for AmeriCredit Financial Services, Inc.
dba GM Financial

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

In re:)	
ALEXIS S. LOKEY)	
<u>Debtor(s)</u>)	CHAPTER 13
)	
AMERICREDIT FINANCIAL SERVICES,)	Case No.: 15-15581 (JKF)
INC. dba GM FINANCIAL)	
<u>Moving Party</u>)	
)	11 U.S.C. 362
v.)	
)	
ALEXIS S. LOKEY)	
<u>Respondent(s)</u>)	
)	
FREDERICK L. REIGLE)	
<u>Trustee</u>)	
)	

ORDER VACATING THE AUTOMATIC STAY
AS TO PERSONAL PROPERTY

Upon the Certificate Of Default filed by AmeriCredit Financial Services, Inc. dba GM Financial, under Bankruptcy Code section 362(d) for relief from the automatic stay as to certain personal property as hereinafter set forth, and for good cause shown;

ORDERED that the automatic stay of the Bankruptcy Code section 362(a) is vacated pursuant to the authority granted in Fed.R.Bankr.P., Rule 4001(a)(3) to permit the movant to pursue the movant's rights in the personal property described as a **2010 Chevrolet Malibu** bearing vehicle identification number 1G1ZB5EB9AF204599 to the extent and in the manner provided by any applicable contract documents and non-bankruptcy law. Bankruptcy Rule 4001(a)(3) is not applicable to this proceeding.

Date: November 13, 2017



UNITED STATES BANKRUPTCY JUDGE
Jean K. FitzSimon

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

IN RE:)
ALEXIS S. LOKEY) 15-15581 (JKF)
)
 Debtor(s)) Chapter 13
)
)

CERTIFICATE OF SERVICE

WILLIAM E. CRAIG, attorney for AmeriCredit Financial Services, Inc. dba GM Financial hereby certifies as follows:

1. I am the attorney for GM Financial and am fully familiar with the facts of this case.
2. On November 6, 2017, I served by electronic means and by regular mail, a copy of the Certificate Of Default and proposed Order to the following individuals:

Debtor
Alexis S. Lokey
8523 Temple Road
Philadelphia, PA 19150

Debtor's Attorney
Michael D. Sayles, Esq.
Sayles and Associates
427 West Cheltenham Avenue
Suite #2
Elkins Park, PA 19027-3201

Office of the US Trustee
833 Chestnut Street
Suite 500
Philadelphia, PA 19107

Trustee
Frederick L. Reigle
Chapter 13 Trustee
2901 St. Lawrence Ave.
PO Box 4010
Reading, PA 19606

Date: 11/6/17

/s/ William E. Craig
William E. Craig
Morton & Craig LLC
110 Marter Ave., Suite 301
Moorestown, NJ 08057
(856) 866-0100
Bar I.D. 92329 - Pennsylvania